

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CYPRESS HOLDINGS, III, L.P., individually  
and derivatively on behalf of SPORT-BLX,  
INC.,

Plaintiff,

v.

Civil Action No. 1:22-cv-1243-LGS

GEORGE HALL, JOSEPH DE PERIO,  
DANIEL STRAUSS, FRANCIS  
RUCHALSKI, CESAR BAEZ,  
CHRISTOPHER JOHNSON, SPORT-BLX,  
INC., SPORT-BLX SECURITIES, INC.,  
CLINTON GROUP INC., and  
GLASSBRIDGE ENTERPRISES, INC.,

Defendants.

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SPORT-BLX, INC., individually and  
derivatively on behalf of its shareholders,

Plaintiff,

v.

Civil Action No. 1:22-cv-8111-LGS

MICHAEL M. SALERNO and CYPRESS  
HOLDINGS, III, L.P.,

Defendants.

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**EXPERT REPORT OF MAHDI ESLAMIMEHR, PhD**

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1. I, Mahdi Eslamimehr, Ph.D., have been retained as an expert consultant by Morvillo Abramowitz Grand Iason & Anello PC in the above-mentioned civil action. Accordingly, I may be asked to perform additional tasks in the future, including, but not limited to, providing expert testimony concerning the parties' claims and defenses in this matter.

## **I. QUALIFICATIONS**

2. I have a Master of Science in Computer Science from Linköping University, Sweden, and a Doctor of Philosophy in Computer Science from UCLA. I have received an MBA certificate from the London School of Economics and Political Science and Management, Leadership, and Strategy Execution certificates from Harvard Business School. I have lectured at UCLA and as adjunct faculty at Cal State Polytechnic. I have authored numerous peer-reviewed articles on software analysis for prestigious conferences and journals. These contributions have received more than 170 citations within the academic community. Additionally, I was honored with the Best Paper award at the IEEE International Symposium on Software Reliability Engineering (ISSRE), a renowned software conference sponsored and hosted by the National Institute of Standards and Technology (NIST).<sup>1</sup> My Curriculum Vitae is attached as **Exhibit A**.

3. I have worked as a software engineer for more than 17 years. My experience includes design, development, and analysis for a wide range of companies and international organizations. I have an extensive background in web-based platforms.

4. I have migrated legacy databases to SQL on behalf of the United Nations World Food Program. I have surveyed and developed software analysis tools for Ericsson AB R&D, microprocessor compiler for Samsung Electronics R&D, and analysis tools to estimate Worst-

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<sup>1</sup> Best Paper at IEEE International Symposium on Software Reliability Engineering (ISSRE): M. Eslamimehr and M. Lesani, "AtomChase: Directed search towards atomicity violations," *2015 IEEE 26th International Symposium on Software Reliability Engineering (ISSRE)*, 2015, pp. 12-23, doi: 10.1109/ISSRE.2015.7381795.

Case Execution for microcontrollers for Verimag. As a CTO and COO for Clarity Global, I have designed and developed operation and business support systems. I also drafted operational strategies to improve company agility and overseen regional performance and operational planning. As the CTO of a software company, I was responsible for putting measures in place and applying tools to protect our main assets and Intellectual Property (including but not limited to source code, configuration, software architecture design, and other know-how) from trade secret theft and misappropriation, copyright violations and digital piracy.

5. As the Vice President of Quandary Peak Research, my current role involves collaborating closely with venture capital and private equity firms and banks. Within this capacity, I contribute significantly to their investment merger and acquisition transactions related to software and digital products. My responsibilities encompass conducting source code reviews, assessing software quality, and valuation during these transactions.

6. My areas of expertise include source code analysis, valuation, online platforms, cryptocurrency, blockchain, and trading systems. In addition, I have performed source code analysis for more than 20 litigation matters.

7. My rate for this engagement is \$1,100 per hour plus reimbursement for any direct expenses. This compensation is tied to the time I have devoted to activities related to this matter. It is not impacted in any way by the opinions I present or the outcome of the case.

## **II. MY TASKS**

8. I was tasked to assess the fairness of the price at which Sport-BLX's software was sold in December 2021.

### **III. MATERIALS CONSIDERED**

9. I was provided with the source code for Sport-BLX, including all source code contributions up until December 2021. I was also given three user scenario diagrams, a copy of the agreement between Sport-BLX and ConsenSys, the minutes from Sport-BLX, Inc.'s board meeting on December 15, 2021, and a document detailing the Purchase Price Allocation of Sport-BLX, Inc. as of December 12, 2021, prepared by Management Planning, Inc.

### **IV. SUMMARY OF OPINIONS**

10. After a comprehensive analysis and considering the state of the market in December 2021, it is my opinion that the Sport-BLX software was sold at a fair price.

### **V. BACKGROUND**

11. The Sport-BLX software is an online platform for investors, with a graphical user interface (GUI) and marketing website designed to facilitate transactions in sports-related securities. This platform presents a suite of simple functionalities that cater to the typical needs of its user base. Figure 1.a-c show some of the use cases in the platform including a user adds a bank account, adds a trade and an accreditation process.

Figure 1.a. User adds a bank account.

Figure 1.b. User adds a trade.

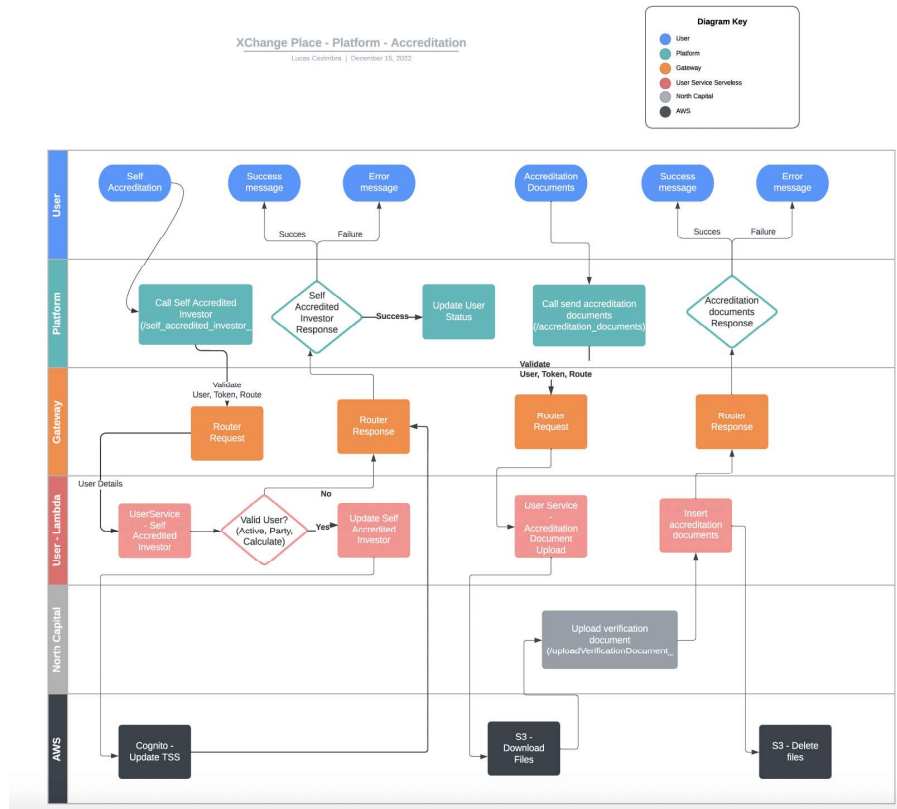


Figure 1.c. Accreditation

12. Once registered, users have the ability to establish an account with a third-party custodian, which becomes their primary interface for managing transactions. They can then navigate through a predefined list of sports-centric securities available for investment. Integration with banking system allows users to link their bank accounts through a third-party vendor, ensuring fluidity in financial transactions. Lastly, a dashboard allows users to track and manage their portfolio, keeping them informed about their holdings.

13. An online investment platform, in its essence, allows users to make investments. In this case, the investments would be in sports related securities. Through a GUI, these platforms provide content and information to assist users in making informed investment decisions.

14. According to the complaint, Sport-BLX software was sold in December 2021 for \$225,000 in cash.

## VI. VALUATION OF SPORT-BLX SOFTWARE QUALITY

15. In this section, I provide detailed analysis of Sport-BLX software, focusing on key factors that predominantly influence its valuation. All assumptions undertaken for this analysis are related to the technological landscape and market conditions as they stood in 2021.

### A. The Sport-BLX software quality analysis

16. The quality of software is undeniably one of the most critical factors when it comes to determining its worth and overall value. Just like any other product, software can vary significantly in terms of its reliability, performance, and security. High-quality software stands out as it consistently delivers reliable and error-free performance, ensuring seamless operations and reducing the risk of potential financial losses or damage to reputation. Simply put, the better the quality of the software, the more valuable and worthy it becomes.

17. To assess the quality of Sport-BLX software, I employed two cutting-edge software quality analysis tools, namely SonarQube and Qodana.

18. **SonarQube:** A code quality analysis tool that allows for “inspection of code quality.” It analyzes more than 30 programming languages and allows a developer or an expert to detect issues in the source code, including software malfunctions, errors, security vulnerabilities, and estimation of time to fix. SonarQube is a valuable tool for ensuring software quality, and its website reports that it is used by major companies and governments across the world to ensure the quality of their software, including the government of Canada, the FBI, NASA, MasterCard, Saab, Bosch, Kaiser Permanente, Ubisoft, and Microsoft.<sup>2</sup>

19. **Qodana:** A powerful software analysis tool that can capture data flow issues, memory performance issues, code warnings, redundant and dead code, and control structure issues.

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<sup>2</sup> <https://www.sonarsource.com/products/sonarqube/>



These potential issues can affect quality metrics like scalability, maintainability, security, and performance. Qodana also provides comprehensive metrics, including code errors and bugs, which are essential to assessing the software development process. According to its website, customers of Qodana include Google, NASA, Ubisoft, and Valve.<sup>3</sup>

20. **Findings.** The Sport-BLX codebase produced includes the following projects and their corresponding source codes: document-management-serverless, marketing-site-v3, rproxy\_api, user\_service\_serverless, gateway, platform, trading\_service\_serverless.

Language	files	blank	comment	code
JSON	67	19	0	94531
TypeScript	291	10173	2182	41655
JavaScript	462	2349	1347	39864
HTML	64	1045	2	31606
Vuejs Component	155	1238	113	16501
XML	4	0	0	16142
SVG	35	2	3	4857
SCSS	34	674	209	3932
YAML	20	110	95	3189
HCL	20	247	9	1125
EJS	23	31	0	451
Bourne Shell	10	112	5	416
Markdown	16	126	0	401
CSS	2	12	9	204
Dockerfile	10	87	31	204
SQL	7	7	15	156
Handlebars	1	25	0	124
Sass	1	16	11	43
SUM:	1222	16273	4031	255401

Figure 2. Sport-BLX source code breakdown

21. The codebase comprises a total of 255,401 lines of code (LOC), including a mix of eighteen different programming languages. A detailed breakdown is provided in Figure 2. Of the seven projects, "marketing-site-v3" corresponds to the software's frontend. The frontend of software refers to the interface and components that users directly interact with. It encompasses the visual design, layout, and user pathways, enabling users to input information, make choices,

<sup>3</sup> <https://www.jetbrains.com/qodana/>

and receive feedback. Essentially, it is the digital 'face' of the software, presenting data and functionalities in a structured and accessible manner, ensuring that the user experience is intuitive and responsive.

22. The six other projects are related to different parts of Sport-BLX's software backend. The backend of software serves as the backbone that supports and connects to the frontend, functioning largely behind the scenes. It encompasses the databases where data is stored, servers that host the software, and the application's core computational logic that processes user inputs from the frontend. Essentially, when a user interacts with the frontend — by clicking a button or submitting a form, for example — the backend receives these interactions, makes needed connections with third-parties, and then returns the necessary data or results back to the frontend to be displayed to the user. The backend is responsible for data management, security protocols, and ensuring seamless communication between various components, making sure that the software operates smoothly and efficiently.

23. An in-depth examination of Sport-BLX's source code using SonarQube indicates that the software is of average quality. Specifically, over 250 errors were found in the code, which can be compared to numerous typos in a book. Several security vulnerabilities were identified, indicating potential weak spots where threats could enter, much like vulnerabilities in a fortress wall. 8.9K code smells were detected, hinting at potential inefficiencies, and 26% of the code was found to be duplicated, indicating redundancy in the code. Lastly, a significant 97 days of technical debt was recorded, suggesting a substantial period required to rectify all identified issues. Collectively, these findings suggest that while Sport-BLX's software and its features are functional, it has room for improvement and does not match the standards of established, better-

funded software products. Figure 3 shows the summary of SonarQube's analysis of the Sport-BLX source code.

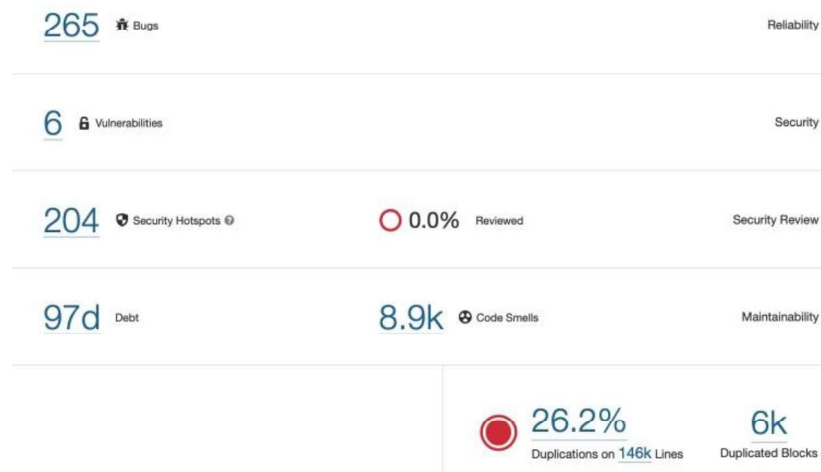


Figure 3. Sport-BLX Code Quality Analysis with SonarQube

24. To ensure a comprehensive and unbiased assessment, I utilized IntelliJ Qodana alongside SonarQube to analyze Sport-BLX's software quality. The results from Qodana echoed those of SonarQube, reinforcing the findings. Specifically, Qodana pinpointed 685 errors in codes written in JavaScript and TypeScript, predominantly related to the software's frontend and user interface. Additionally, 13 errors were discovered in JSON files connected to the API Gateway, a component responsible for mediating communication within the software. Furthermore, Qodana corroborated the presence of 25 security warnings. Figure 4 below summarizes Qodana's findings.

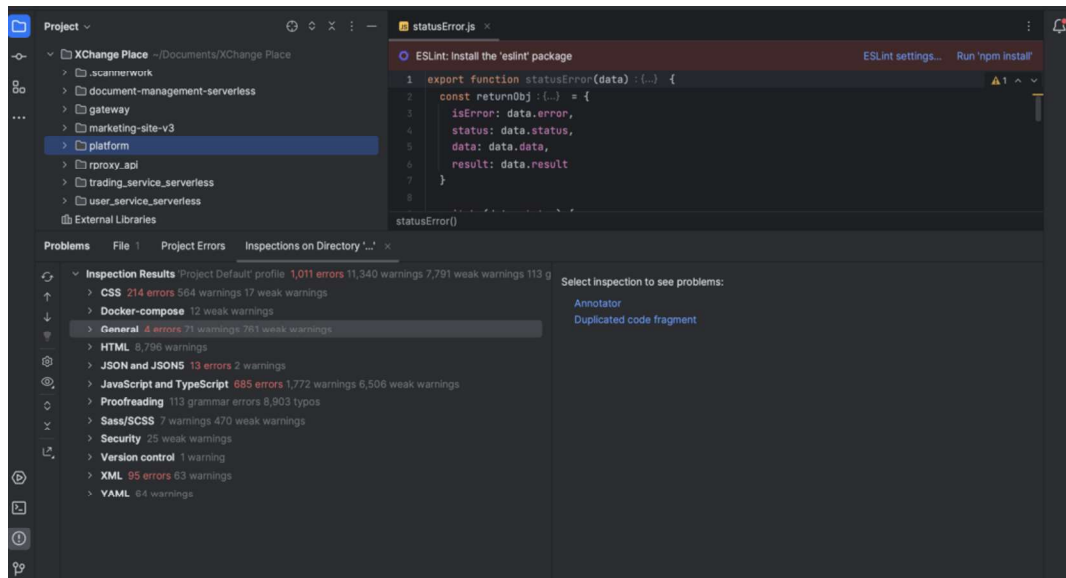


Figure 4. Sport-BLX Code Quality Analysis with IntelliJ Qodana

25. In summary, both Qodana and SonarQube, two industry standard software quality analysis tools, arrived at similar conclusions regarding Sport-BLX's software quality, i.e., indicating its average quality. Software of average quality, such as Sport-BLX might function adequately but lacks the precision, sophistication, and reliability inherent in more established, better-funded offerings.

## B. The Sport-BLX software feature analysis

26. Sport-BLX software features are limited but meet the expectations for the securitization and fractionalization of sports-related securities and their sales to interested investors.

27. When assessing the capabilities of the SportBLX software, it is apparent that it is functional for its intended purposes. At the same time, it was created for very specific purposes and does not have the flexibility that a potential buyer may need for other uses. My analysis confirmed that SportBLX software is positioned on the lower end of the spectrum in terms of comprehensive capability. This conclusion is consistent with Sport-BLX's stated purpose of

applying securitization techniques to sports-related assets and thereby developing a new asset class; it was not seeking to build a high-tech trading platform.

**C. Integration & Compatibility in Online Trading Platforms**

28. My examination of the Sport-BLX software, shows as of 2021, the platform was in its early stages of establishing integrations with major financial networks. Notably, the software had initiated connections to a limited number of banks, one of which included North Capital. Although the engineering team demonstrated foresight by adopting an industry best practice technology stack and embracing the Open API standard - a move that potentially simplified future integrations - the platform's API Gateway and overall infrastructure were still in the early phases of development consistent with companies in similar stages and resources.

29. Consequently, the incomplete integration landscape of Sport-BLX, when benchmarked against more mature platforms, suggests a diminished worth and market appeal for someone looking to buy software for a purpose different from the specific purpose for which the software was developed.

**D. The Open-Source Software and Its Impact on Software Valuation**

30. The rise of open-source software affects the perception of the value of proprietary systems. Open-source software (OSS) is similar to a community-built playground: various experts and enthusiasts contribute freely, resulting in tools that anyone can use, modify, or distribute. To understand the impact of open-source on software valuation, let's consider the world of smartphone operating systems. Imagine a company investing millions, or even billions, into developing a new smartphone operating system from scratch. Once completed, they have a new proprietary operating system with a shiny user interface. The cost of development was astronomical, accounting for research, design, testing, and numerous iterations. On paper, one might assume that this massive

investment should equate to a high market valuation for the software. However, here is where the open-source world throws a wrench into traditional valuation methods: Android, a state-of-the-art, continually updated, and globally recognized operating system, is available for free. Manufacturers around the world can use Android, modify it, and sell devices without paying a dime for the software. In this scenario, how could a new, expensive operating system compete? If Android, with its vast ecosystem and developer support, costs nothing, what is the value proposition of the new platform? Thus, regardless of its development cost, its market value is instantly diminished, almost to the point of being negligible. This is not an isolated case. In the world of web servers, Apache, a free open-source software, dominates the market, overshadowing many proprietary options. Similarly, Linux, another open-source offering, powers a significant chunk of servers across the world, providing a tough competition for paid alternatives.

31. Between 2019 and 2021, Open-Source communities grew from a few core developers to large, global networks. The reliability, security and capabilities of the Open-Source software behind decentralized exchanges improved tremendously over the two years. Rigorous auditing and an influx of skilled developers dedicating their talents to these projects enabled impressive growth.

32. For an early-stage software like that developed by Sport-BLX, this was a significant challenge: in a world teeming with free, open-source solutions, Sport-BLX's software, no matter the potential of the Sport-BLX business as a whole, would face an uphill battle to be recognized. In this environment, dominated by free and open offerings, the worth of Sport-BLX source code was, by virtue of its developmental stage and competition, positioned at a very low level.

### **E. Opinion**

33. Above, I have evaluated the Sport-BLX software in detail, concluding that its quality sits at an average level. This assessment was informed by a thorough static code quality analysis. I further undertook a robust comparison of the software's features as they stood in 2021 versus the prevailing industry standards, revealing that Sport-BLX's software offerings were notably limited. Moreover, my code inspection verified that the Sport-BLX software had the capability to interface with only a limited number of financial institutions. This limited interoperability could potentially deter many potential users from adopting the platform. Lastly, I performed a comprehensive review of the landscape of open-source centralized and decentralized online trading platforms from 2019 to 2021. My findings indicated a surge in high-quality, freely available platforms by 2021, adding to the competitive pressures for Sport-BLX.

34. Considering the comprehensive evaluation outlined above, the valuation of Sport-BLX software in 2021 becomes unequivocally clear. For a potential buyer equipped with this information, the appeal of purchasing the Sport-BLX software would be substantially diminished. One must pose the question: Why, in 2021, would an informed investor choose to allocate funds for a software solution that is merely average in quality, restrictively limited in features, and open to integration challenges? Especially when, at the same juncture, there existed state-of-the-art platforms equipped with advanced features, superior integration capabilities, and — crucially — were available at no cost. The market dynamics, coupled with the availability of these sophisticated open-source alternatives, render the commercial appeal of Sport-BLX software close to none.

35. From the perspective of the Sport-BLX software owner in December 2021, any forthcoming offer can reasonably be perceived as equitable based on the prevailing market conditions, changes in open-source software availability, and an assessment of the software's

inherent attributes and limitations. I therefore believe that, in December 2021, the \$225,000 software purchase price referenced in the Complaint was fair and reasonable for Sport-BLX.

**VII. AFFIRMATION**

36. I certify under penalty of perjury and pursuant to the United States of America laws that the preceding is true and correct to the best of my knowledge.

Date: September 12<sup>th</sup>, 2023

  
Dr. Mahdi Eslamimehr



## **Mahdi Eslamimehr, Ph.D., MBA**

VP of Emerging Tech Due Diligence

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Mahdi Eslamimehr is an award-winning scientist and a senior tech executive in the software product and service industry. He has years of experience in leading tech companies around the world. At Quandary Peak he serves as an expert witness in IT and computer-related litigation, such as patent and intellectual property infringement, breach-of-contract, and software disputes.

Mahdi leads the technical due diligence team, providing technology and IP consulting to VCs, Fortune 100, and private equity firms in matters of M&A transactions, VC startup investments, acqui-hires and IP matters.

## **Education**

### **Ph.D. in Computer Science**

University of California | Los Angeles, California | Feb 2014

### **M.S. in Computer Science**

Linköping University | Linköping, Sweden | Sept 2008

## **Degrees & Certifications**

- **Strategy Execution** | May 2023  
Harvard Business School, Boston, MA
- **Business Management** | Apr 2022  
Harvard Business School | Boston, MA
- **Leadership Principles** | Dec 2022  
Harvard Business School, Boston, MA
- **Master of Business Administration (MBA)** | Sept 2019  
London School of Economics and Political Science, London, UK
- **Digital Maturity and Transformation Practitioner**, TM Forum | Sept 2018

## Employment

### Vice President of Technical Due Diligence

Quandary Peak Research | Los Angeles, CA | Sept 2021–Present

- Leading the technical due diligence department at Quandary Peak Research. My team provides technology and IP consulting to VCs, Fortune 100, and private equity firms in matters of M&A transactions, VC startup investments, acqui-hires and IP matters.

### Director of Software Litigations

Quandary Peak Research | Los Angeles, CA | July 2021–Sept 2022

- Providing software analysis and expert witness testimony in software-related litigation, including patent infringement, trade secret disputes, software malfunctions, breach-of-contract suits, and other matters.
- Performing forensic investigations of computer systems, including examining digital data, recovering lost and corrupted files, auditing digital records and logs, and analyzing document metadata.
- Investigating software failures to determine the root cause and help clients understand whether and how such failure could have been avoided.
- Applying advanced analytic techniques based on calibrated parametric models for valuation of software products and estimation of software development costs.

### Chief Technology & Operating Officer

Clarity Global | Sydney, Australia | Apr 2018–Dec 2020

- Applying creative initiatives to convert board strategies into actionable/measurable KPIs in doubling the company size within two years and increasing overall productivity by 20%.
- Drafting the company's operational strategies and improving agility.
- Overseeing regional HQs' (EMEA, APAC) performance and helping with annual operation planning with 10+ global accounts/projects and 150 staff for more than 500 M subscribers of fix (FTTx) and mobile (2G/3G/4G, Data/IP, Transmission, Voice, IMS, Circuit Switch, Broadband) networks.
- Development and execution of technical roadmap concerning the company's vision and goals.
- Creating three R&D centers in Australia, Bulgaria, and Sri Lanka to escalate innovation and product development.

### Chief Technology Officer

Clarity Global | Sydney, Australia | Jan 2017–Mar 2018

Developing an Operational and Business Support Systems (OSS/BSS). Responsible for:

- Designing and developing intelligent, zero-touch, autonomous OSS of the future across SDN, NFV, vRAN with OPEN-API for empowering 5G networks (CRM, Business Assurance, Billing, Call/Contact Center).
- Transforming from the legacy monolith and obsolete frameworks to Microservice and Kubernetes Architecture, Angular Front End, Cloud Solutions, AI/ML, and Big Data Analytics.
- Expanding product portfolio from OSS to BOSS (BSS/OSS) full-stack with full-service orchestration from BSS layer to OSS improving business assurance.
- Developing product roadmaps and coaching presales and technical sales teams for demos and marketing materials based on TMForum Standards, e.g., SID, eTOM, and TAM.

## **Visiting Research Fellow**

Human Advancement Research Community, Y Combinator Research | Los Angeles, CA | Jan 2017–June 2018

- Worked closely with MIT Media Lab, SAP Labs, University of Washington, and University of California Los Angeles to build products and frameworks using innovative and emerging technologies in the context of Computer Simulation, Video Games, Social Systems, Programming Languages, and Compilers.

## **Expert Witness and Consultant**

Quandary Peak Research | Los Angeles, CA | Aug 2015–July 2016

Responsibilities involved conducting legal research and preparing memoranda, drafting written submissions, witness statements and other procedural documents, evidence gathering, coordinating the work of foreign counsel and experts.

Other projects I have worked on as a Junior Associate:

- Providing software analysis and expert witness testimony in software-related litigation, including patent infringement, software malfunctions, breach-of-contract suits, and other matters.
- Applying advanced analytic techniques based on calibrated parametric models for valuation of software products and estimation of software development costs.
- Documenting software systems architecture to identify structural similarities and differences among competing products and services and deducing the origin of software designs and code.

## **Visiting Faculty**

Computer Science Department, University of California | Los Angeles, CA | June 2014–June 2015

- Conducting software research in the Compiler Lab in testing and formal verification of concurrent, parallel, and web-based programs.

## **Postdoctoral Scholar**

SAP Labs / Viewpoints Research Institute | July 2014–July 2015

- Developing a new testing environment for JavaScript programs and web applications.
- Implementing a web-based framework to improve human-computer interaction using natural language processing techniques.
- Implementing an automatic behavior-driven testing technique for checking the correctness of web applications with natural language.
- Implemented a new constraint-based declarative programming language for rapid web-based application prototyping.
- Implementing a syntactically and semantically correct program generation tool with Parsing Expression Grammars for JavaScript applications.

## **Adjunct Faculty**

California State Polytechnic, Pomona | Sept 2013–June 2014

- Teaching graduate and undergraduate courses (Software Engineering and Object-Oriented Design Patterns) in the Computer Science Department.
- Teaching an undergraduate course (Industrial Computation) in the Industrial and Manufacturing Engineering Department.

## **Graduate Fellow**

Computer Science Department, University of California | Los Angeles, CA | Sept 2008–Feb 2014

- Designed and implemented VICE, a testing tool for memory management and timing analysis of event-driven embedded systems.
- Designing and implementing several testing tools to detect concurrency bugs in large-scale Java programs, including:
  - Racagedon: A tool to detect rare data races in multithreaded Java programs.
  - Sherlock: A tool to detect rare deadlocks in multithreaded Java programs.
  - AtomChase: A tool to detect rare atomicity violations in multithreaded Java programs.

## **Graduate Research Intern**

CNRS, VERIMAG | Grenoble, France | June 2013–Sept 2013

- Designing and implementing a tool to estimate Worst-Case Execution Time for microcontrollers.–Implementing a task scheduling system for processors with no timing anomaly.

## **Graduate Research Intern**

Samsung Electronics R&D Center | San Jose, CA | June 2010–Sept 2010

- Designing and implementing a scalable topology language for many-core processors, named Samsung PARallel Real-Time Architecture (SPARTA). SPARTA is a set of tools and a run-time framework that enables superior software performance through dynamic (adaptive) parallelization and system-wide coordination of processing, memory, and I/O resources.
- Designing and implementing Components Configuration Language (CCL) as a subset of SPARTA. SPARTA's CCL is a domain-specific programming language used to rapidly generate source code for a component-based application.
- Analyzing the performance of distributed tasks on many-core architectures for Tilera processors.

## **Software Engineer**

Ericsson AB R&D | Stockholm, Sweden | Dec 2007–May 2008

- Designing and implementing a model-based testing framework for Ericsson's applications.–Analyzing accuracy and performance of telecommunication testing tools.

## **Graduate Research Intern**

Conformiq Qtronic | Helsinki, Finland | May 2007–July 2007

- Surveying state-of-art model-based testing tools.
- Developing prototype applications for Conformiq tools.

## **Software Intern**

United Nations World Food Program | Tehran, Iran | June 2004–Sept 2004

- Designing and implementing an internal communication database.
- Migrating legacy databases to SQL.

## Litigation Consulting

- ◆ Retained as a testifying expert
- ◆ Provided a report, declaration, deposition testimony, or trial testimony
- **3D Systems, Inc. v. Ben Wynne, et al.** | Sept 2023–Present  
 Jurisdiction: United States District Court Southern District of California  
 Case Number: 3:21-CV-01141-LAB-DEB  
 Counsel: Smith, Gambrell & Russell, LLP  
 Nature of Suit: Trade Secrets
- ◆ **Cypress Holdings, III v. Sport-BLX, Inc** | Aug 2023–Present  
 Jurisdiction: Southern District of NY  
 Case Number: 1:22-cv-01243  
 Counsel: Morvillo Abramowitz Grand Iason & Anello PC  
 Nature of Suit: Breach of Contract
- ◆ **dmarcian, Inc. v. DMARC Advisor BV** | Aug 2023–Present  
 Jurisdiction: U.S. District Court for the Western District of North Carolina, Asheville  
 Case Number: 1:21-cv-00067-MR  
 Counsel: Womble Bond Dickinson (US) LLP  
 Nature of Suit: Copyright
- ◆ **Bang Huynh v. T-Mobile USA Inc** | June 2023–July 2023  
 Jurisdiction: Federal - California Central  
 Case Number: 2-22-CV-01537 - 20468  
 Counsel: Kersten & Associates
- **Entangled Media, LLC v. Dropbox, Inc.** | May 2023–Present  
 Jurisdiction: Western District of Texas  
 Case Number: 1:22-cv-01324  
 Counsel: Skiermont Derby  
 Nature of Suit: Patent
- ◆ **Nextpulse, LLC. v. Brunswick Corp.** | May 2023–Present  
 Jurisdiction: US District Court for the Northern District of Georgia  
 Case Number: CGC-18-571065  
 Counsel: Edelsberg Law, P.A.  
 Nature of Suit: Class Action
- ◆ **Jazmine Harris v. Public Broadcasting Service** | Apr 2023–May 2023  
 Jurisdiction: US District Court for the Northern District of Georgia  
 Case Number: 1:22-cv-02456-AT  
 Counsel: Edelsberg Law, P.A.  
 Nature of Suit: Class Action
- ◆ **Jabari Seller v. Bleacher Report, Inc. (Warner Media)** | Apr 2023–May 2023  
 Jurisdiction: US District Court for the Northern District of California  
 Case Number: 3:2023cv00368  
 Counsel: Edelsberg Law, P.A.  
 Nature of Suit: Class Action

- ♦ **Zachary Rohlfs v. WGNTV (Nexstar Media Inc)** | Apr 2023–May 2023  
Jurisdiction: US District Court for the Central District of Illinois  
Case Number: 1:23-cv-01050  
Counsel: Edelsberg Law, P.A.  
Nature of Suit: Class Action
- ♦ **Jennifer Waller v. Tampa Bay Times (Times Publishing Company)** | Apr 2023–May 2023  
Jurisdiction: US District Court for the Middle District of Florida  
Case Number: 8:23-cv-00119  
Counsel: Edelsberg Law, P.A.  
Nature of Suit: Class Action
- ♦ **Greg Roland v. The Chive (Chive Media Group, LLC)** | Apr 2023–May 2023  
Jurisdiction: US District Court for the Western District of Texas  
Case Number: 1:2023cv00337  
Counsel: Edelsberg Law, P.A.  
Nature of Suit: Class Action
- ♦ **Emma Mendoza v. Newsweek Digital, LLC** | Apr 2023–May 2023  
Jurisdiction: US District Court for the Southern District of New York  
Case Number: 1:2023cv00643  
Counsel: Edelsberg Law, P.A.  
Nature of Suit: Class Action
- ♦ **Melanie Barber v. Eisenhower Medical Center, Inc.** | Apr 2023–May 2023  
Jurisdiction: California Central District Court  
Case Number: 5:23-cv-00250  
Counsel: Edelsberg Law, P.A.  
Nature of Suit: Class Action, Breach of Contract
- ♦ **Emma Mendoza v. WP Company LLC dba The Washington Post** | Apr 2023–May 2023  
Jurisdiction: U.S. District of Columbia Superior Court  
Case Number: 2023CAB001101  
Counsel: Edelsberg Law, P.A.  
Nature of Suit: Class Action
- ♦ **LifeScience Technologies, LLC v. Mercy Health** | Mar 2023–Present  
Jurisdiction: U.S. District Court for the Eastern District of Missouri  
Case Number: 4-21-cv-1279 SEP  
Counsel: Stinson LLP  
Nature of Suit: Breach of Contract & Trade Secret Misappropriation
- ♦ ♦ **Goldfarb v. Acceleron Law Group, et al** | Feb 2023–May 2023  
Jurisdiction: American Arbitration Association  
Case Number: AAA 1110025228  
Counsel: Century Law Group  
Nature of Suit: Breach of Contract
- ♦ ♦ **Bit Reactor v. Reaktor Group Oy** | Jan 2023–Mar 2023  
Jurisdiction: U.S. Patent and Trademark Office  
Case Number: 92079422  
Counsel: Gerard Fox Law  
Nature of Suit: Trademark

- **Wildseed Mobile, LLC v. Google LLC** | Jan 2023–Present  
 Jurisdiction: U.S. District Court for the Eastern District of Texas  
 Counsel: Feinberg Day Kramer Alberti Lim Tonkovich & Belloli LLP  
 Nature of Suit: Patent Infringement
- ♦♦ **BagCam LLC v. Ristich LLC** | Jan 2023–Present  
 Jurisdiction: American Arbitration Association  
 Counsel: Ramey Litigation Group  
 Nature of Suit: Breach of Contract
- **Nation Info Corporation v Karl Rink** | Jan 2023 –Present  
 Jurisdiction: American Arbitration Association  
 Counsel: Structure Law Group  
 Nature of Suit: Breach of Contract
- ♦♦ **FastTrac Transportation, LLC v. Pedigree Technologies, LLC** | Jan 2023–Present  
 Jurisdiction: U.S. District Court for the District of North Dakota  
 Counsel: Shackelford, Bowen, McKinley & Norton, LLP  
 Nature of Suit: Breach of Contract
- ♦ **CommScope, Inc v. Rosenberg Technology Co. Ltd** | Nov 2022–Present  
 Jurisdiction: U.S. District Court for the District of New Jersey  
 Counsel: King & Wood Mallesons LLP  
 Nature of Suit: Trade Secrets
- ♦ **Content Engine, LLC v. Rumble USA, Inc** | Nov 2022–Present  
 Jurisdiction: U.S. District Court for Southern District of New York  
 Counsel: Burk, Williams, Sorensen LLP  
 Nature of Suit: Patent
- **CG3 Media, LLC v. Belleau Technologies, LLC** | Sept 2022–Dec 2022  
 Jurisdiction: U.S. District Court for Middle District of Florida  
 Counsel: Radulescu LLP  
 Nature of Suit: Patent
- ♦♦ **HowLink Global LLC v. Verizon, Corp.; ATT Corp.** | July 2022–July 2023  
 Jurisdiction: U.S. District Court for Eastern District of Texas  
 Counsel: LTL Attorneys  
 Nature of Suit: Patent
- ♦♦ **OpenText Corporation v. Softil, Inc** | July 2022–Mar 2023  
 Jurisdiction: American Arbitration Association  
 Counsel: Vedder Price  
 Nature of Suit: Breach of Contract
- ♦♦ **ClubReady LLC v. Xponential Fitness** | June 2022–Present  
 Jurisdiction: American Arbitration Association  
 Counsel: Willkie Farr & Gallagher LLP  
 Nature of Suit: Breach of Contract
- ♦♦ **1-800 Hansons LLC v. Rightpoint Consulting LLC** | May 2022–Sept 2022  
 Jurisdiction: American Arbitration Association  
 Counsel: Honigman LLP  
 Nature of Suit: Breach of Contract

- **Broadband iTV, Inc v. Comcast Corporation; Comcast Cable Communications, LLC; NBCUniversal Media, LLC; Charter Communications, Inc; Charter Communications Holding Company, LLC; Spectrum Management Holding Company, LLC; Altice USA, Inc; CSC Holdings, LLC; Cablevision Systems Corp.** | Apr 2022–Sept 2022  
Jurisdiction: International Trade Commission  
Counsel: Feinberg Day Kramer Alberti Lim Tonkovich & Belloli LLP  
Nature of Suit: Patent
- **Video Labs, Inc v. Dell Technologies Inc and Dell Inc** | Apr 2022–Jan 2023  
Jurisdiction: U.S. District Court for Western District of Texas  
Counsel: Feinberg Day Kramer Alberti Lim Tonkovich & Belloli LLP  
Nature of Suit: Patent
- **Mbyte Tech Hong Kong Limited v. AdShoppers, Inc d/b/a Minty.com** | Mar 2022–Apr 2022  
Jurisdiction: U.S. District Court for Western District of North Carolina  
Counsel: Bayramoglu Law  
Nature of Suit: Trademark
- ♦♦ **M. Lahatte and The Lahatte Company v. S. Smith, and TopCoat Holdings, LLC** | Feb 2022–Mar 2021  
Jurisdiction: American Arbitration Association  
Counsel: Bishop & Mills  
Nature of Suit: Trademark
- ♦♦ **JK Soft, Inc v. Innoas, Inc** | Feb 2022–Present  
Jurisdiction: U.S. District Court for the District of New Jersey  
Counsel: Choi Law Group  
Nature of Suit: Trade Secret and Copyright
- ♦♦ **Ventive LLC v. Title Pipe, Inc** | Nov 2021–Feb 2021  
Jurisdiction: American Arbitration Association  
Counsel: Mooney Wieland  
Nature of Suit: Breach of Contract
- ♦ **Chetu, Inc v. Bodies Done Right, LLC d/b/a/ Health 360** | Oct 2021–Dec 2021  
Jurisdiction: Circuit Court, County of Broward, State of Florida  
Counsel: Lampert Law Firm  
Nature of Suit: Breach of Contract
- **Express Mobile, Inc v. Google LLC** | Aug 2021–Present  
Jurisdiction: U.S. District Court for the Eastern District of Texas  
Counsel: Feinberg Day Kramer Alberti Lim Tonkovich & Belloli LLP  
Nature of Suit: Patent Infringement
- ♦ **Infoshare Systems, Inc v. La Telugu LLC** | Aug 2021–June 2022  
Jurisdiction: Superior Court of California, County of Orange  
Counsel: Curat Lex, Inc  
Nature of Suit: Breach of Contract
- **Burhaan Saleh v. Nike, Inc et al** | Aug 2021–Dec 2021  
Jurisdiction: US District Court for the Central District of California  
Counsel: Bursor and Fisher PA  
Nature of Suit: Class Action



- **Bridge IT Consulting, Inc v. Join Digital, Inc** | Aug 2021–Aug 2021  
Jurisdiction: Superior Court of California, County of Santa Clara  
Counsel: Finestone Hayes LLP  
Nature of Suit: Breach of Contract
- **Centripetal Networks, Inc v. Palo Alto Networks, Inc** | July 2021–Present  
Jurisdiction: U.S. District Court for the Eastern District of Virginia  
Counsel: Kramer Levin Naftalis & Frankel LLP  
Nature of Suit: Patent
- **Trevera Solutions, Inc v. Semtech Corporation** | Feb 2016–July 2016  
Jurisdiction: Superior Court of California, County of Orange  
Counsel: Tredway, Lumsdaine & Doyle, LLP  
Nature of Suit: Trade Secret
- **Global Equity Management (SA) PTY. Ltd v. alibaba.com, Inc, Alibaba group holding Ltd** | Jan 2016–July 2016  
Jurisdiction: U.S. District Court for the Eastern District of Texas  
Counsel: Ramey & Schwaller, LLP  
Nature of Suit: Patent
- **Internap Corporation v. Noction, Inc** | Dec 2015–Mar 2016  
Jurisdiction: U.S. District Court for the Northern District of Georgia  
Counsel: Warner Norcross & Judd LLP  
Nature of Suit: Patent
- **Ericsson Inc v. TCL Communication Technology Holdings, Ltd** | Dec 2015–July 2016  
Jurisdiction: U.S. District Court for the Central District of California  
Counsel: Sheppard Mullin Richter & Hampton LLP  
Nature of Suit: Patent
- **Fitbit Inc v. Jawbone Inc** | Oct 2015–July 2016  
Jurisdiction: U.S. District Court for the Northern District of California  
Counsel: Gibson, Dunn & Crutcher LLP  
Nature of Suit: Patent
- **T-Mobile USA, Inc v. Huawei DeviceUSA, Inc** | Oct 2015–July 2016  
Jurisdiction: U.S. District Court for the Western District of Washington  
Counsel: Hueston Hennigan LLP  
Nature of Suit: Trade Secrets
- **Tait Environmental Services Inc v. Pro TechnologyAutomation, Inc** | Oct 2015–Mar 2016  
Jurisdiction: Superior Court of California, County of Orange  
Counsel: Pettibone & Associates  
Nature of Suit: Trade Secrets
- **Nicole, Inc v. B.L.K. International, Inc** | Sept 2015–Oct 2015  
Jurisdiction: U.S. District Court for the Central District of California  
Counsel: Greenberg & Bass LLP  
Nature of Suit: Copyright
- **Bryndon Fisher v. The United States of America** | July 2015–July 2016  
Jurisdiction: Pre-Litigation  
Counsel: Schubert Jonckheer & Kolbe LLP  
Nature of Suit: Class Action

- **Chipp'd Ltd v. Crush & Lovely LLC** | July 2015–Aug 2015  
Jurisdiction: American Arbitration Association  
Counsel: White and Williams LLP  
Nature of Suit: Breach of Contract
- **Seymore Levine v. The Boeing Company** | July 2015–July 2016  
Jurisdiction: U.S. District Court for the Central District of California  
Counsel: Quinn Emanuel Urquhart & Sullivan LLP  
Nature of Suit: Patent

## Tech Due Diligence Consulting

- **213 Management-Sandbox Industries** | Startup M&A | July 2023  
Technology: AI/ML, Insurance, Health
- **SitusAMC** | Startup M&A | July 2023  
Technology: AI/ML, Real Estate, SaaS
- **Safe Life Defense** | Internal Tech Audit | June 2023  
Technology: e-Commerce, SaaS
- **Genpact** | M&A | May 2023  
Technology: AI/ML, Predictive Analysis
- **EnoviQ Technology** | Technical Vetting | Oct 2022  
Technology: SaaS, AI/ML, Insurance
- **Foundation Partners Group** | Startup M&A | Oct 2022  
Technology: SaaS, B2B/B2C, Funeral Services
- **The Computing Technology Industry Association** | Startup M&A | July 2022–Sept 2022  
Technology: SaaS, B2B/B2C, E-Learning Platform
- **Hello Hive** | Technical Vetting | July 2022–Sept 2022  
Technology: SaaS, CRM
- **Parkland Health/Parkland Center for Clinical Innovation** | Startup M&A | May 2022–Sept 2022  
Technology: AI/ML/NLP, EHR
- **Lionard PTE, Ltd** | Startup M&A | Mar 2022  
Technology: Blockchain, Dynamic Document Management Systems
- **Tenex Capital Management** | Startup M&A | Mar 2022  
Technology: B2B/B2C, Digital Health
- **Schneider Electric** | Startup Investment | Dec 2021  
Technology: Electric Vehicles, SaaS
- **Setana Energy Ltd** | Startup Investment | Nov 2021  
Technology: Big Data Analytics, AI/ML, FMCG
- **Saudi Research and Media Group (SRMG)** | Startup Investment | Nov 2021  
Technology: AI/ML, NLP, E-Commerce, and Media Content Management
- **Schneider Electric** | Startup Investment | Oct 2021  
Technology: Renewable Energy, SaaS

- **Tenex Capital Management** | Startup M&A | Sept 2022  
Technology: Lead Generation, AI/ML, Insurance, Real Estate

## IP Valuation and Patent Portfolio Analysis

- **E<sup>N</sup>NAT IP** | Technical Vetting | Apr 2023–Oct 2023  
Technology: Virtual Private Network, CDN, M2M, Edge/Fog Computing, Enterprise Solutions
- **Goldfarb. LLC.** | Technical Vetting | Feb 2023–Feb 2023  
Technology: Blockchain Authentication

## Invited Talks

- **Event-Based Directed Testing** | Howard Hughes Lab, Malibu | 2013
- **Directed Testing: From FPGAs to Supercomputers** | Intel Corp. | Seattle, WA | 2012
- **Model-Based Testing: State of Art** | Ericsson AB | Helsinki, Finland | 2008

## Journals & Magazines

- M. Eslamimehr, M. Lesani, G. Edwards | 2018  
***Efficient detection, and validation of atomicity violations in concurrent programs***  
Journal of Systems and Software, Vol.137, P 618-635

## Conference Papers

- O. Freiberg, J. Palsberg, M. Eslamimehr | 2016  
***Retargetable Communication for Distributed Programs***  
In Proceedings of 12th International ACM SIGSOFT Conference on the Quality of Software Architectures (QoSA'16)
- M. Eslamimehr, G. Edwards | 2015  
***End-to-End Cross-Language Test Case Generation for Web Applications***  
In Proceedings of the 9th ACM SIGMETRICS International Conference on Performance Evaluation Methodologies and Tools (ValueTools'15)
- M. Eslamimehr, M. Lesani | 2015 | Best Paper Award  
***AtomChase: Directed Search Towards Atomicity Violations***  
In Proceedings of the 26th IEEE International Symposium on Software Reliability Engineering (ISSRE'15)
- H. Samimi, A. Warth, M. Eslamimehr, A. Borning | 2015  
***Constraints as a Design Pattern: from Sketchpad61 to Sketchpad14***  
In Proceedings of ACM SIGPLAN International Symposium on New Ideas, New Paradigms, and Reflections on Programming & Software (Onward!'15)

- M. Eslamimehr, J. Palsberg | 2014

***Sherlock: Scalable Deadlock Detection for Concurrent Programs***

In Proceedings of the 22nd ACM SIGSOFT International Symposium on the Foundations of Software Engineering (FSE'14)

- M. Eslamimehr, J. Palsberg | 2014

***Race Directed Scheduling of Concurrent Programs***

In Proceedings of the ACM SIGPLAN Annual Symposium on Principles and Practice of Parallel Programming (PPOPP'14)

- M. Eslamimehr, J. Palsberg | 2013

***Testing versus static analysis of maximum stack size***

In Proceedings of the 37th IEEE International Conference on Computers, Software & Applications (COMPSAC'13)

## Workshop Papers & Other Publications

- A. Warth, T. Garnock-Jones, M. Eslamimehr | 2018

***Recognizing and Generating Terms using Derivatives of Parsing Expression Grammars***

In Proceedings of Arxiv.org, CoRR abs/1801.10490

- Mahdi Eslamimehr, Hesam Samimi | 2015

***Timing Analysis of Event-Driven Programs with Directed Testing***

In Proceedings of WCET'15, 15th International Workshop on Worst-Case Execution Time Analysis, a satellite workshop of the 27th Euromicro Conference on Real-Time Systems

## Posters & Demonstrations

- **Directed Scheduling of Concurrent Programs**

UCLA Tech Forum | Jan 2014

- **Enhancing Components Configuration Language on SPARTA**

Samsung US R&D | San Jose | 2010

- **Scalable Topology Language for Many-Core Processors**

Samsung US R&D | San Jose | 2010

## Patent Applications

- Patent Case No. UC-2014-323-1-LA. Serial No. 61/904,977

***Race Directed Scheduling of Concurrent Programs***

Mahdi Eslamimehr, Jens Palsberg | Filed November 15, 2013

## Memberships

- **World Economic Forum** | Emerging Technology Professional | May 2023–Present
- **California Arbitration** | Founding Member | Nov 2022–Present
- **Harvard Business Review** | Advisory Council Member | July 2022–Present
- **Harvard Business Review** (Los Angeles Chapter) | Aug 2022–Present
- **Advisory Board for the Transformative Leadership in Disruptive Times University of California, Riverside** | Member | Sept 2021–Present
- **Los Angeles County Bar Association** (LACBA) | Aug 2021–Present

## Honors & Awards

- **Open Science Data Cloud PIRE National Science Foundation Scholarship** | 2013
- **UCLA Graduate Division Fellowship** | 2009-2011

## Teaching

- **Lecturer** | Fall 2014  
Software Engineering, Cal Poly Pomona
- **Lecturer** | Spring 2014, Winter 2014, Fall 2013  
Object-Oriented Design Pattern, Cal Poly Pomona
- **Lecturer** | Spring 2014, Winter 2014, Fall 2013  
Industrial Computation, Cal Poly Pomona
- **Teaching Assistant** | Winter 2013  
Java Applications, UCLA Math Department
- **Teaching Assistant** | Fall 2012, Fall 2011  
Compiler Construction, UCLA Computer Science Department
- **Teaching Assistant** | Winter 2010  
Introduction to Computer Science, UCLA Computer Science Department
- **Teaching Assistant** | Fall 2007  
Software Engineering, Linkoping Computer Science Department
- **Teaching Assistant** | Fall 2007  
Data Structure and Algorithm, Linkoping Computer Science Department
- **Teaching Assistant** | Fall 2007  
Human-Computer Interaction, Linkoping Computer Science Department

## Research Community Service

- Reviewer | 2023  
**Advances in Science, Technology and Engineering Systems Journal**
- Reviewer | 2015  
**Software: Practice and Experience (SPE)**
- Reviewer | 2015  
**IEEE Transactions on Software Engineering (TSE)**
- Reviewer | India | 2015  
**5th International Conference on Computer and Communication Technology (ICCT)**
- AEC Program Committee Member | 2015  
**42nd ACM SIGPLAN-SIGACT Symposium on Principles of Programming Languages (POPL)**
- AEC Program Committee Member | 2015  
**20th ACM SIGPLAN Symposium on Principles and Practice of Parallel Programming (PPOPP)**
- AEC Program Committee Member | 2015  
**ACM SIGPLAN Symposium on Code Generation and Optimization (CGO)**
- AEC Program Committee Member | 2015  
**36th ACM SIGPLAN Conference on Programming Language Design and Implementation (PLDI)**
- AEC Program Committee Member | 2014  
**28th European Conference on Object-Oriented Programming (ECOOP)**
- AEC Program Committee Member | 2014  
**ACM SIGPLAN Conference on Object-Oriented Programming, Systems, Language and Applications (OOPSLA)**